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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,

Plaintiff,

vs.

CHEVRON USA, INC., a California
Corporation, and DOES 1 through 10,
inclusive,

Defendants.

) CASE NO.: 2:23-cv-6302-HDV-AJR
)
)
) **DECLARATION OF OLIVIA FLECHSIG**
) **IN SUPPORT OF PLAINTIFF MARK**
) **SNOOKAL'S OPPOSITION TO**
) **DEFENDANT CHEVRON USA, INC.'S**
) **MOTION IN LIMINE NO. 1 TO**
) **EXCLUDE EVIDENCE OR TESTIMONY**
) **OF ANY SUBJECTIVE OPINION OR**
) **BELIEF BY PLAINTIFF REGARDING**
) **HIS PAST OR FUTURE ECONOMIC**
) **DAMAGES**
)
) *[Filed concurrently with Plaintiff's*
) *Memorandum of Points and Authorities in*
) *Opposition to Defendant's Motion in Limine*
) *No. 1 and [Proposed] Order Denying*
) *Defendant's Motion in Limine No. 1]*
)
) District Judge: Hon. Hernan D. Vera
) Magistrate Judge: Hon. A. Joel Richlin
) Action Filed: August 3, 2023
) Trial Date: August 19, 2025
)
) Hearing Date: July 24, 2025
) Hearing Time: 10:00 a.m.
) Courtroom: 5B

DECLARATION OF OLIVIA FLECHSIG

I, Olivia Flechsig, declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am an associate with the law firm Allred, Maroko & Goldberg, counsel of record for Plaintiff Mark Snookal. As such, I have personal knowledge of the facts set forth below and, if called as a witness, could and would testify competently to such facts under oath.

2. I make this declaration in support of Plaintiff Mark Snookal's Opposition to Defendant Chevron USA, Inc.'s Motion in Limine No. 1 to Exclude Evidence or Testimony of Any Subjective Opinion or Belief by Plaintiff Regarding His Past or Future Economic Damages.

3. My colleague, Dolores Y. Leal, defended the deposition of Plaintiff Mark Snookal in this matter on May 10, 2024, and I am in possession of a certified copy of his deposition transcript. Attached hereto as **Exhibit A** is a true and correct copy of relevant excerpts from Mr. Snookal's deposition transcript.

4. Attached hereto as **Exhibit B** is a true and correct copy of the Assignment Offer for the Reliability Engineering Manager Position in Escravos, Nigeria which Mr. Snookal authenticated as Exhibit 1 to his Declaration in Support of Plaintiff's Opposition to Defendant Chevron's Motion for Summary Judgment (See Docket 31).

5. Ms. Leal defended the deposition of Plaintiff's Economic Expert, Dr. Charles L. Baum on February 10, 2025, and I am in possession of a certified copy of his deposition transcript. Attached hereto as **Exhibit C** is a true and correct copy of relevant excerpts from Dr. Baums's deposition transcript.

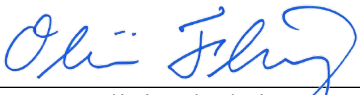
6. Attached hereto as **Exhibit D** is a true and correct copy of Dr. Baum's Expert Report, which he authenticated as Exhibit 1 to his deposition.

7. Attached hereto as **Exhibit E** is a true and correct copy of documents Defendant produced as CUSA00240-242, a job description for the Reliability Engineering Manager position in Escravos, Nigeria dated March 27, 2019.

8. Attached hereto as **Exhibit F** is documents Defendant produced as CUSA00690-692, documents reflecting Chevron's U.S. Payroll Exempt Salary Structure (Payscale Groups 17-

1 30) for years 2019 – 2021.

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3 I declare under penalty of perjury under the laws of the State of California
4 that the foregoing is true and correct, and that this Declaration was executed on July 15, 2025, at
5 Los Angeles, California.

6
7 
8 _____
9 Olivia Flechsig